

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Enbridge Pipelines (Illinois), L.L.C.,)	
)	
Application Pursuant to Section 8-503, 8-509 and)	07-0446
15-401 of the Public Utilities Act/The Common)	Upon Reopening
Carrier by Pipelines Law to Construct and Operate)	
a Petroleum Pipeline and When Necessary to Take)	
Private Property As Provided by the Law of)	
Eminent Domain.)	

**PLIURA INTERVENORS' RESPONSE TO
"TURNER INTERVENORS' MOTION TO COMPEL, TO VACATE THE FILING
DEADLINE FOR TESTIMONY, TO CONTINUE THE SCHEDULED HEARING, AND
TO SUSPEND THE PROCEEDING"**

Pursuant to the August 28, 2014 ruling of the Hon. Administrative Law Judge, Pliura Intervenor, by and through their joint counsel, respectfully offer the following response with respect to "Turner Intervenor's motion to compel, to vacate the filing deadline for testimony, to continue the scheduled hearing, and to suspend the proceeding".

Turner Intervenor, like Pliura Intervenor, served Applicant with a number of timely and relevant data requests. Applicant responded to those requests with "answers" that were, for the most part the same non-responsive and uncivil histrionics that have filled the pages of many of Applicant's filings. Irrespective of Applicant's protestations, the data requests by Turner Intervenor are relevant for discovery purposes and the responses by Applicant are improper and deficient. Pliura Intervenor join with Turner Intervenor and adopt Turner's data requests and the instant motion to compel, and respectfully urge the Hon. Administrative Law Judge to grant the motion.

Further, Applicant's refusal to provide meaningful responses to the data requests of Turner Intervenor and Pliura Intervenor necessitates the other relief sought by both groups. Intervenor were severely prejudiced in their compliance with the current (now past) deadline for

filing testimony and exhibits and will be equally prejudiced from meaningful participation in the upcoming hearing unless the deadlines are vacated. Applicant has created this circumstance through its own actions. It cannot now be allowed to feign shock and outrage over the consequences of its obfuscations. For these reasons, and for those reasons offered by Turner Intervenors in their motion, Pliura Intervenors respectfully pray the Hon. Administrative Law Judge grants the relief sought in the Motion.

Respectfully submitted this 29th Day of August, 2014.

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PROOF OF SERVICE

The undersigned certifies that on this 29th day of August, 2014 he served a copy of the foregoing document upon the individuals on the attached service list, by electronic mail.

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